

1 GERALD E. BRUNN, SBN 107004
2 DREXWELL M. JONES, SBN 221112
3 LAW OFFICES OF BRUNN & FLYNN
4 A Professional Corporation
5 928 12th Street, Suite 200
6 Modesto, CA 95354
7 Telephone: (209) 521-2133
8 Facsimile: (209) 521-7584

9 Attorneys for Respondent, TARA KRAUSE

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

11 MICHAEL KRAUSE,

12 Petitioner,

13 vs.

14 TARA KRAUSE,

15 Respondent.

Case No.: 1:21-cv-01706-NONE-SAB

**DECLARATION OF TARA KRAUSE IN
SUPPORT OF RESPONDENT'S RESPONSE
TO MOTION TO DISMISS**

**Evidentiary Hearing: May 25, 2022 (3 days)
Time: 9:00 a.m.
Courtroom: 9 (SAB)**

17 I, Tara Krause, hereby declare:

18 1. On May 3, 2022, a friend of mine living in Germany informed me the house where
19 Michael Krause and I last lived together, in Weilerbach, was being listed as available for rent. When I
20 went to the website, Ramstein Bookoo (<http://ramstein.bookoo.com/i/74654956>), I saw that it was true.
21 Attached as **Exhibit A** are true and correct copies from the website that depict the house where Michael
22 and I last lived.

23 2. On May 4, 2022, I reached out to Karin Nowak, the property manager of the Weilerbach
24 house. She said Michael gave notice and agreed to move out by June 1, 2022. A true and correct copy of
25 my email with Ms. Nowak is attached hereto as **Exhibit B**.

26 3. As Michael is in possession of many of my belongings which I had left behind, as well as
27 my dogs, I tried to learn where Michael was moving.
28

1

DECLARATION OF TARA KRAUSE IN SUPPORT OF RESPONDENT'S RESPONSE TO MOTION TO DISMISS

1 4. An airman based in Germany informed me Michael was going to be the Director of
2 Operations (“DO”) for Lt. Col. Mikita Brown, Commander of the 605th Test and Evaluation Squadron,
3 Detachment 3, at Beale Air Force Base in California, starting this summer (2022).

4 5. A true and correct copy of a text communication between the airman and Mikita Brown is
5 attached hereto has as **Exhibit C**. Michael’s aviator call sign is “Sour”. Mikita Brown’s aviator call sign
6 is “Foxy”. Mikita knew by at least April 22, 2022 that Michael (Sour) was going to be her DO.

7 6. On May 11, 2022, I contacted a member of the 605th TES at Beale. The Airman stated
8 Michael had applied for and received a humanitarian reassignment and was the new DO starting this
9 summer. I immediately informed my counsel that an Airman at Beale had confirmed Michael was to
10 start as the DO this summer. As it turns out, Michael did not receive a humanitarian reassignment. His
11 orders to be assigned to Beale Air Force Base were made according to the normal process of obtaining a
12 new assignment.

13 7. The commissioned officer corps of the Air Force is a small community. Airmen do not
14 wish to appear to “cross” other officers, such as Michael, for fear of retribution or reprisal. The airmen I
15 spoke with refused to sign declarations and asked their names not be revealed. They did, however,
16 provide specific and detailed information that can be substantiated.

17 8. During my marriage to Michael, the Air Force has reassigned Michael and our family to
18 new bases six times. The process of determining the next assignment typically begins four to six months
19 before the final orders are issued. Generally, the airman fills out a “dream sheet” listing three or four
20 assignments he or she prefers for the next assignment about six months prior to the end of his or her
21 current assignment. Thereafter, the airman is sent a list of open assignments for which they are qualified.
22 The airman selects an available position and makes his or her intentions known. Then there are informal
23 communications with the airman’s current commander and the receiving commander, to make sure the
24 new assignment is a good fit. By the time a “hard order” (the permanent change of station order) is
25 issued, the new assignment has been confirmed for several months.

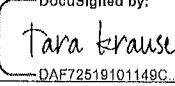
26 9. For example, Michael’s current assignment to Germany started on January 31, 2020. We
27 knew in early July of 2019 that we were going to be reassigned to Germany, the discussions had been had
28 and the approvals had been given. I made a Facebook announcement that the Krause family has headed

1 back to Germany on July 26, 2019. A true and correct copy of my Facebook announcement is attached
2 hereto as **Exhibit D**.

3 10. Michael has been trying to get a "DO" position for approximately ten years. He has
4 applied for DO positions in the past and was not given the the assignment. With respect to Michael's
5 career and becoming a Colonel (O-6), he has felt a DO position was an important step.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on May 24, 2022, at Merced, California.

8 DocuSigned by:
9 
10 DAF72519101149C...
11 Tara Krause

12 K:\docs\cases\6892-21288\pleadings\Dec of Tara Krause ISO Mot to Dismiss
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

Weilerbach, older, freest. house with yard and double-garage

2100€ + util by AGRA-Immobilien in Ramstein, 2 days ago

[Follow](#)[Forward](#)[Share](#)[Pin](#)[Tweet](#)

Weilerbach, older freest. house with yard and double-garage, 216sqm, 4 bedrooms, 2 baths, living-diningroom, new BIK, terrace, basement, available 8. june 2022

Weilerbach is a perfect location, you have shops all around, gas stations, restaurants and so on, you quick on base and in Kaiserslautern.

Please call for questions or if you want to see it: 06371-465435

Posted in: Rental - by agent. 3 people are following this item.

Find out how close you are to this item!

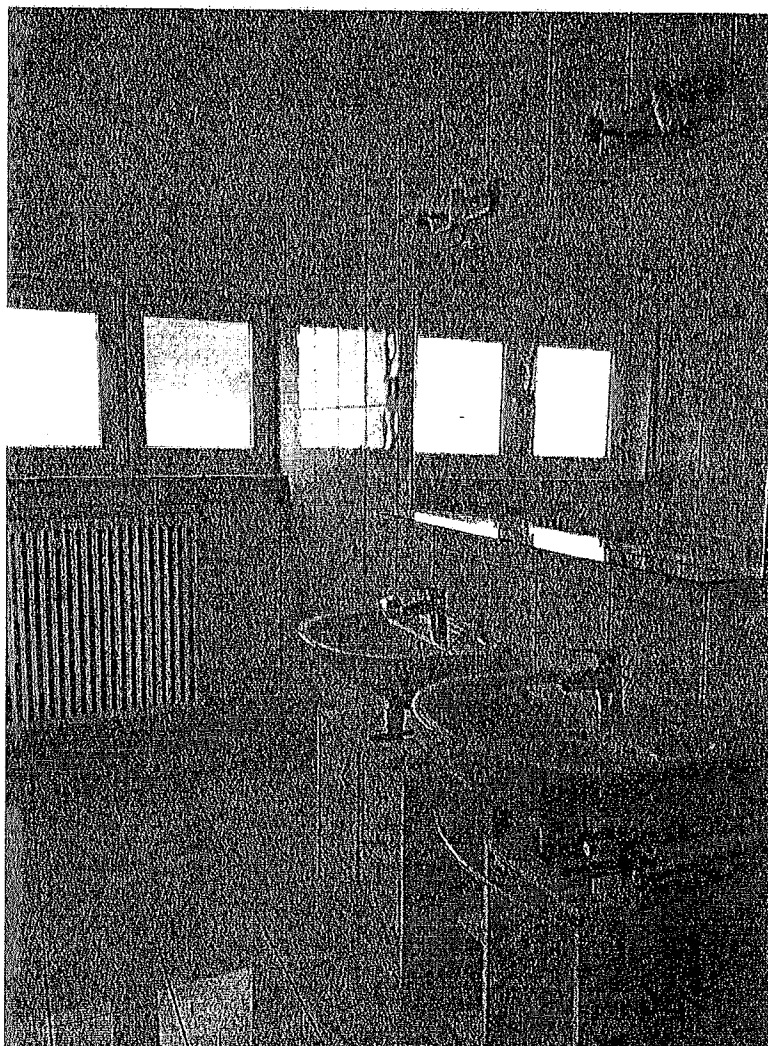
[Send Message](#)

POSTED BY: AGRA-IMMOBILIEN

MORE FROM:

Weilerbach, older, freest. house with yard and double-garage

2100€ + util by AGRA-Immobilien in Ramstein, 2 days ago



Follow

Forward

Share

Pin

Tweet

Weilerbach, older freest. house with yard and double-garage, 216sqm, 4 bedrooms, 2 baths, living-diningroom, new BIK, terrace, basement, available 8. june 2022

Weilerbach is a perfect location, you have shops all around, gas stations, restaurants and so on, you quick on base and in Kaiserslautern.

Please call for questions or if you want to see it: 06371-465435

Posted in: Rental - by agent. 3 people are following this item.

Find out how close you are to this item!

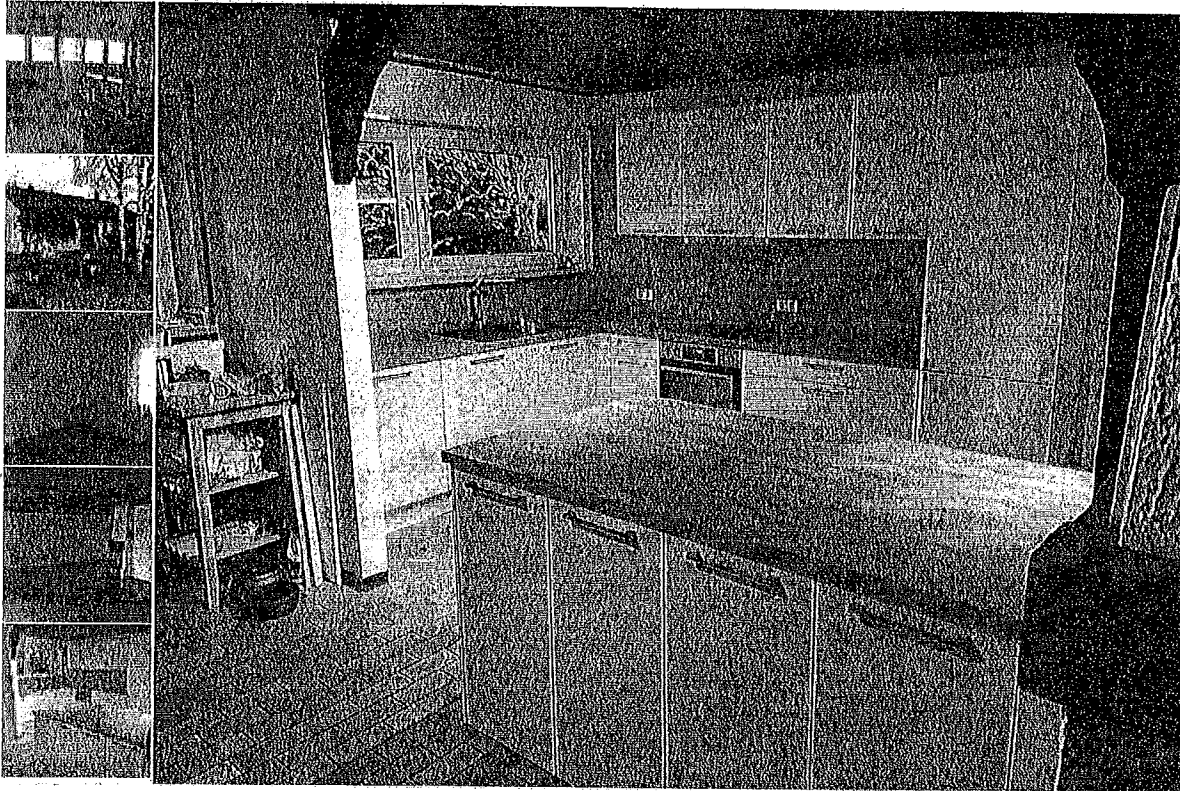
Send Message

POSTED BY: AGRA-IMMOBILIEN

MORE FROM:

Wellerbach, older, freest. house with yard and double-garage

2100€ + util by AGRA-Immobilien in Ramstein, 2 days ago



Follow

Forward

Share

Pin

Tweet

Weilerbach, older freest. house with yard and double-garage, 216sqm, 4 bedrooms, 2 baths, living-diningroom, new BIK, terrace, basement, available 8. june 2022

Weilerbach is a perfect location, you have shops all around, gas stations, restaurants and so on, you quick on base and in Kaiserslautern.

Please call for questions or if you want to see it: 06371-465435

Posted in: Rental - by agent. 3 people are following this item.

Find out how close you are to this item!

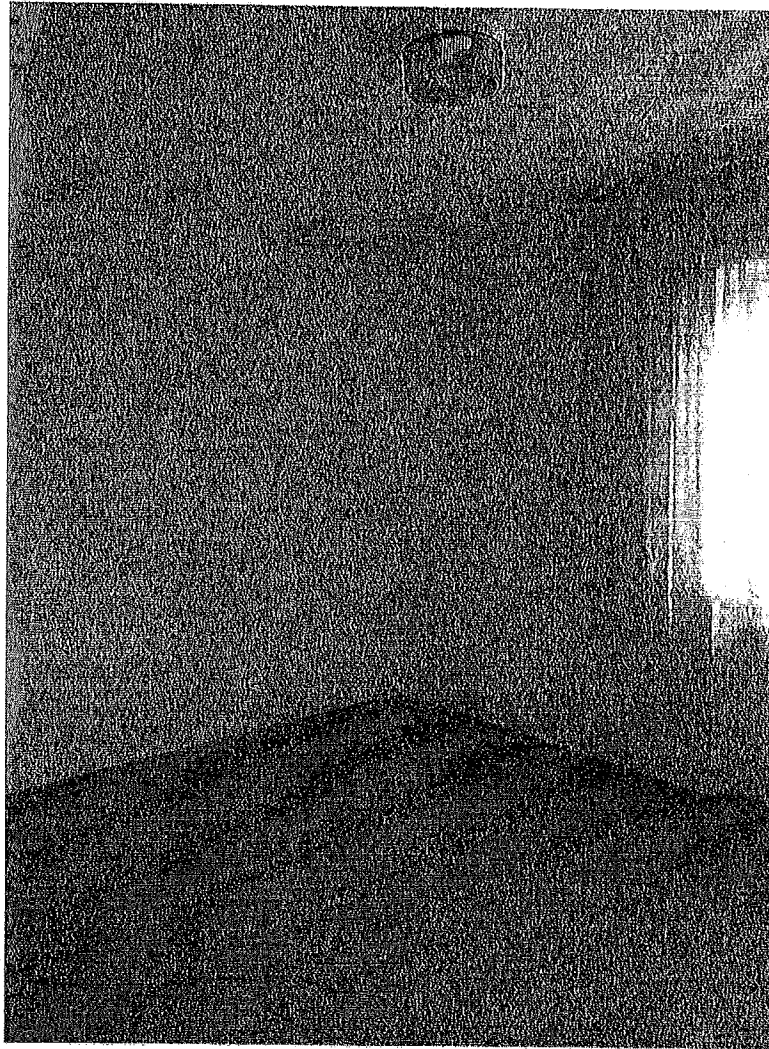
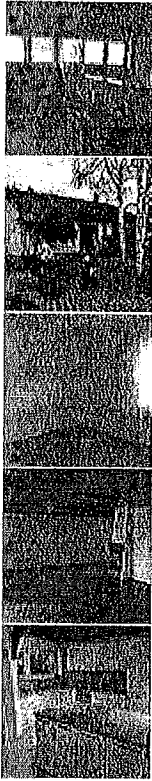
Send Message

POSTED BY: AGRA-IMMOBILIEN

MORE FROM:

Wellerbach, older, freest. house with yard and double-garage

2100€ + util by AGRA-Immobilien in Ramstein, 2 days ago



Follow

Forward

Share

Pin

Tweet

Weilerbach, older freest. house with yard and double-garage, 216sqm, 4 bedrooms, 2 baths, living-diningroom, new BIK, terrace, basement, available 8. june 2022

Weilerbach is a perfect location, you have shops all around, gas stations, restaurants and so on, you quick on base and in Kaiserslautern.

Please call for questions or if you want to see it: 06371-465435

Posted in: Rental - by agent. 3 people are following this item.

Find out how close you are to this item!

Send Message

POSTED BY: AGRA-IMMOBILIEN

MORE FROM:

Weilerbach, older, freest. house with yard and double-garage

2100€ + util by AGRA-Immobilien in Ramstein, 2 days ago

[Follow](#)[Forward](#)[Share](#)[Pin](#)[Tweet](#)

Weilerbach, older freest. house with yard and double-garage, 216sqm, 4 bedrooms, 2 baths, living-diningroom, new BIK, terrace, basement, available 8. june 2022

Weilerbach is a perfect location, you have shops all around, gas stations, restaurants and so on, you quick on base and in Kaiserslautern.

Please call for questions or if you want to see it: 06371-465435

Posted in: Rental - by agent. 3 people are following this item.

Find out how close you are to this item!

[Send Message](#)

POSTED BY: AGRA-IMMOBILIEN

MORE FROM:

EXHIBIT B

----- Forwarded message -----

From: Karin Nowak - domo Immobilienverwaltung GmbH <karinnowak@domo-immobilienverwaltung.de>
Date: Wed, May 4, 2022 at 11:58 PM
Subject: AW: Re:
To: Tara Krause <tskrause@gmail.com>

Dont ask me, he gave me the termination note to 1.-June.

Karin

Von: Tara Krause <tskrause@gmail.com>
Gesendet: Mittwoch, 4. Mai 2022 18:44
An: Karin Nowak - domo Immobilienverwaltung GmbH <karinnowak@domo-immobilienverwaltung.de>
Betreff: Re:

I saw that the house will be available june 8. How is he able to do that without orders?

On Wed, May 4, 2022 at 4:04 AM Karin Nowak - domo Immobilienverwaltung GmbH <karinnowak@domo-immobilienverwaltung.de> wrote:

No I have not.

Von: Tara Krause <tskrause@gmail.com>

Gesendet: Mittwoch, 4. Mai 2022 00:45

An: Karin Nowak - domo Immobilienverwaltung GmbH <karinnowak@domo-immobilienverwaltung.de>

Betreff:

Hi Karin

Do you have a copy of Michael's new orders since he is moving?

Thank you

Tara Krause

EXHIBIT C

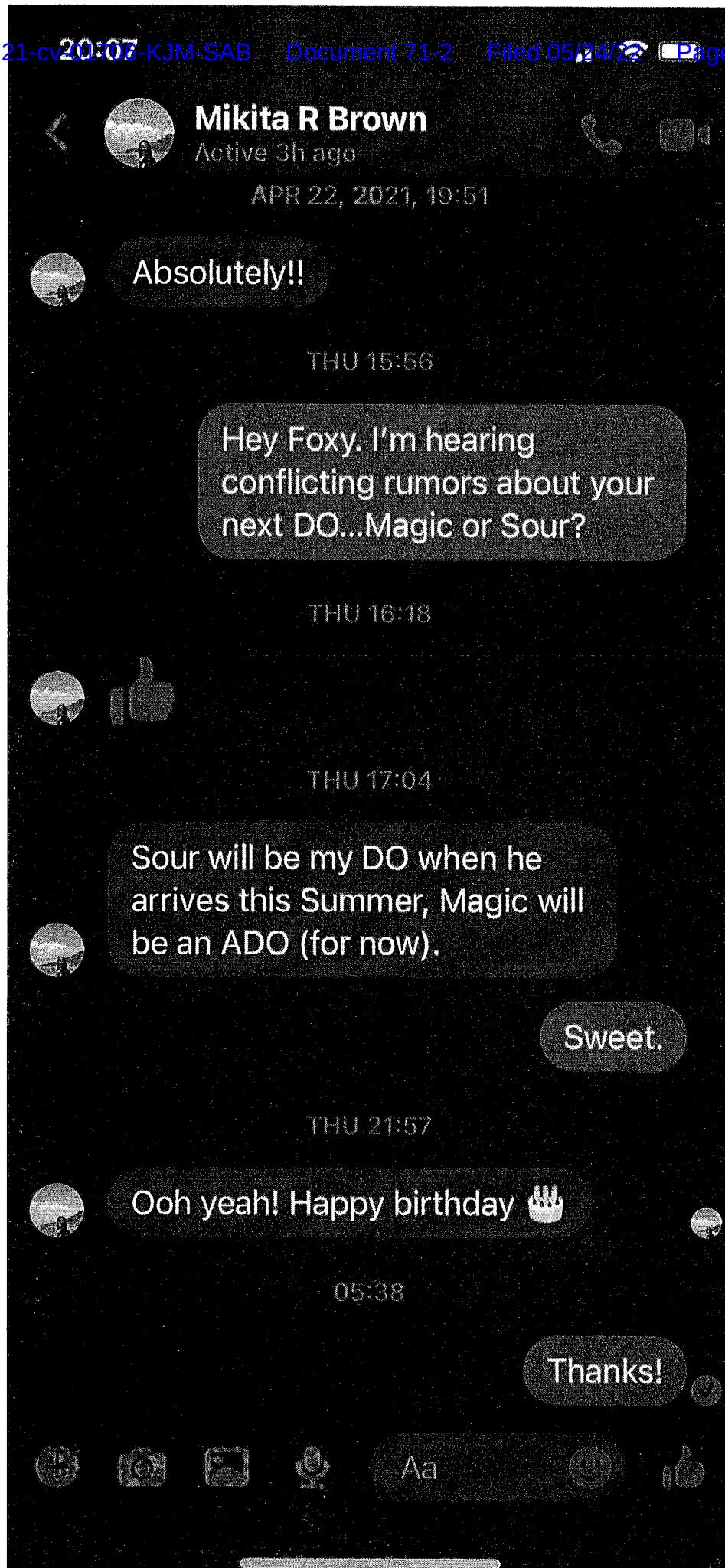


EXHIBIT D



Tara Shumaker-Krause



Tara Shumaker-Krause is with Michael Krause.



Jul 26, 2019 · 2

The Krause's are heading BACK to GERMANY! And we're soooo excited!!



media1.tenor.co

114

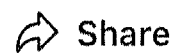
36 comments



Like



Comment



Share



Home



Watch



News



Marketplace



Notifications



Menu